

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SUSAN PINSKY,	:	ECF
	:	
Plaintiff,	:	07 Civ. 3328 (CM) (HP)
	:	
- against -	:	DEFENDANT'S NOTICE OF
	:	MOTION FOR SUMMARY
JP MORGAN CHASE & CO.,	:	JUDGMENT PURSUANT TO
	:	<u>FED. R. CIV. P. 56</u>
Defendant.	:	

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PLEASE TAKE NOTICE that, upon the Complaint, filed March 27, 2007 in the Supreme Court of the State of New York, County of New York, Defendant's Amended Answer, filed June 4, 2007, the annexed Affidavit of Frederic L. Lieberman, sworn to September 20, 2007, Defendant's Statement Pursuant to Local Civil Rule 56.1(a), the accompanying memorandum of law, and all the prior pleadings and proceedings heretofore had herein, Defendant JPMorgan Chase Bank, N.A., incorrectly named herein as JPMorgan Chase & Co., by and through its attorneys, the JPMorgan Chase Legal and Compliance Department, Frederic L. Lieberman, Assistant General Counsel, will move this Court, before the Honorable Colleen McMahon, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, for an order and judgment, pursuant to Fed. R. Civ. P. 56, granting summary judgment in favor of Defendant and dismissing the Complaint and the above-captioned action on the grounds that, on the undisputed material facts, Plaintiff released her claims against Defendant and therefore Defendant is entitled to judgment as a matter of law, and for such other relief as this Court deems just and proper.

Dated: September 20, 2007

Yours, etc.,

**JPMORGAN CHASE LEGAL AND
COMPLIANCE DEPARTMENT**

By: 

Frederic L. Lieberman

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